

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

UNITED STATES OF AMERICA	§	
	§	
V.	§	CAUSE NO. SA-17-CR-031 XR
	§	
	§	
MICHAEL J. BADGETT	§	

**DEFENDANT'S UNOPPOSED MOTION FOR VOLUNTARY SURRENDER**

TO THE HONORABLE JUDGE XAVIER RODRIGUEZ OF THE UNITED STATES  
DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS:

NOW COMES Defendant Michael J. Badgett, by and through his undersigned attorney,  
and files this Unopposed Motion for Voluntary Surrender, and would show this Honorable Court  
as follows.

I.

On January 10, 2018, and by way of a second amended judgment dated February 5, 2018,  
this Court sentenced Defendant to a total sentence of 12 months to be served at a residential reentry  
center (halfway house) in the State of Florida.

II.

Defendant seeks to self-surrender on March 22, 2018, which is the date that was given to  
Mr. Badgett by the Bureau of Prisons in Florida. There was a confusion on whether Mr. Badgett  
should surrender on March 11 or April 6 due to the amendment of the judgment. Pretrial Services  
Officer Gilbert Maldonado does not oppose the March 22 self-surrender date.

III

Counsel for the government Assistant United States Attorney Daniel P. Butler does not  
oppose the relief requested.

IV

Wherefore, premises considered, Defendant respectfully prays that this Honorable Court will grant the motion for voluntary surrender on March 22, 2018, for service of sentence.

Respectfully submitted.

MAUREEN SCOTT FRANCO  
Federal Public Defender

/s/ MARINA-THAIS DOUNEAT  
Assistant Federal Public Defender  
Western District of Texas  
727 E. Cesar E. Chavez Blvd., B-207  
San Antonio, Texas 78206-1205  
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State Bar Number: Texas 00798310

*Attorney for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 2nd day of March, 2018, I electronically filed the foregoing Defendant's Unopposed Motion for Voluntary Surrender with the Clerk of the Court using the CM/ECF system, which will give notification of such filing to the following:

Daniel P. Butler  
Trial Attorney, Fraud Section  
Criminal Division  
U.S. Department of Justice  
1400 New York Avenue, N.W., Room 4404  
Washington, D.C. 20530

/s/ MARINA-THAIS DOUENAT  
*Attorney for Defendant*

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V.

MICHAEL J. BADGETT

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CAUSE NO. SA-17-CR-031 XR

**ORDER**

On this date came on to be considered the Defendant's Unopposed Motion For Voluntary Surrender, and the Court having considered the motion and the premises, is of the opinion that the motion should be, and the same is hereby GRANTED. It is therefore ORDERED that Defendant Michael J. Badgett shall not be required to self-surrender until March 22, 2018, for service of his sentence. The Clerk shall serve a copy of this Order on the United States Marshal, the United States Pretrial Services Office, and the Bureau of Prisons.

So ORDERED on this the \_\_\_\_\_ day of March, 2018.

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XAVIER RODRIGUEZ  
United States District Judge